

U.S. DISTRICT COURT
N.D. OF N.Y.
FILED

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

FEB 17 2016
LAWRENCE K. BAERMAN, CLERK
ALBANY

BRONINA RUSLANA OLEGOVNA

(full name(s) of the plaintiff or petitioner applying (each person must submit a separate application))

-against-

1:16-cv-192 (GLS/CFH)

(Provide docket number, if available; if filing this with your complaint, you will not yet have a docket number)

VTB CAPITAL,
NATIONAL POLICE OF SPAIN AND OTHER

(full name(s) of the defendant(s)/respondent(s))

Honorable Chief District Judge Gary L. Sharpe!

Right Honorable judge, Since the courts of the United States are an example of fair justice for the majority of countries of the world and the last hope at protecting fundamental human rights and democracy, I would like to express my deep reverence and the sincere belief in the fair consideration of my complaint.

Let me inform you, that I, as a plaintiff, fulfilled the requirements of Rule 8 of the Federal Rules of civil procedure and filed a complaint. To the complaint are added two copies of the complaint and copies of the documents that are attached to the original.

In taking a complaint to the legal proceedings, I'll be ready to send a copy of the complaint with the documents that are attached to it, to the defendant, who is in Ukraine - to the National bank of Ukraine.

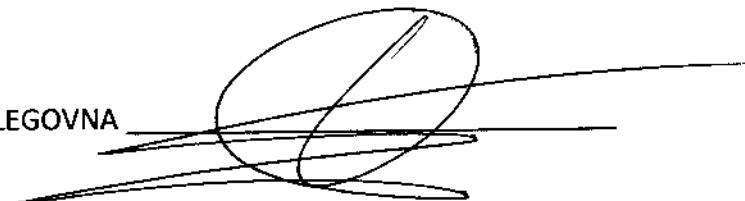
If necessary, I'm ready as quickly as possible to fulfill all the recommendations and observations of the court on this complaint.

Focus attention of the court on the fact, that financial compensation of violated rights is not the subject of this complaint, and the subject of the complaint is to restore my rights and justice and the rights of US taxpayers in the fight against international corruption.

With deep respect,

01.02.2016

Plaintiff: BRONINA RUSLANA OLEGOVNA



UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

To the United States District Court for the Northern District of New York
Honorable Chief District Judge Gary L. Sharpe
445 Broadway, Room 112 Albany, NY 12207 USA,

Bronina Ruslana Olegovna
against
VTB Capital, National Police of Spain and other

Parties:

Plaintiff:

citizen of Ukraine, Bronina Ruslana Olegovna, public activist and human rights defender,
member of the Coalition anti-corruption organizations
Address: Ukraine, Kiev, 03087, str. Umanskaya, 31, building 2
Post address: Ukraine, Kiev, 03087, Ukraine, Kiev-87, Post box 27
E-mail: blacklisteu@mail.ru Tel.: +38067 398-80-57

Defendant 1:

VTB Capital

Address: Federation Tower West, 12, Presnenskaya emb., Moscow, 123100 Russian Federation
e-mail: info@vtbcapital.com
President and Chairman of VTB Capital Mr. Andrey Kostin
VTB Capital carries out operates in Moscow, London, New York
Representative office of VTB Capital in New York- VTB Bank New York
Address: 452 Fifth Avenue, 23rd Floor, New York NY 10018
Representative office of VTB Capital in London- VTB Capital Plc,
Address: VTB Capital Plc, London 14 Cornhill, London EC3V 3ND United Kingdom
e-mail: postmaster@vtbeurope.com

Defendant 2:

National Police of Spain

Address: C/ Miguel Ángel, 5 28010 - Madrid Spain
Director General of National Police of Spain Don Ignacio Cosidó Gutiérrez

Defendant 3:

National Bank of Ukraine
Address: 9 Instytutska St., Kyiv 01601 Ukraine
e-mail: NBU@BANK.GOV.UA
Tel (+ 38 044) 253-01-80, Fax (38 044) 230-20-33, 253-77-50

COMPLAINT

Guided by the United States Federal law on offenses against foreigners (Foreign Relations Authorization Act), according to which a foreign citizen can complain to the US court on the foreign country or the officials of his country in case of, if have been violated fundamental principles of international law, protecting human rights, in accordance with Article III, Section 2 of the US Constitution, I am Bronina Ruslana Olegovna, citizen of Ukraine, appeal to the United States District Court for the Northern District of New York for protection of my fundamental rights, which have been violated by unlawful actions higher officials of Russia and Ukraine, and also for the protection of the rights of US citizens, because the state of USA is the main financial donor of the financial system of Ukraine, and therefore, the USA taxpayers' rights also violated by unlawful actions of VTB Capital, National Bank of Ukraine and the National Police of Spain

My complaint is based on the following.

VTB Capital (the Investment Business of VTB Group the main owner of the bank - Russian Federation), National Bank of Ukraine and the National Police of Spain is not in the interests of their peoples and in violation of the fundamental rights of their citizens and me personally in 2013-2015 used

official status in order to participate and concealment of major financial fraud, which was carried December 23, 2013 for the withdrawal and laundering money through the National Bank of Ukraine in the amount of \$ 3 billion of funds of the National Welfare Fund of the Russian Federation.(document №4 attached)

Still more, National Bank of Ukraine , **VTB Capital**, and its regional structures have used their official position for the key role not only in the withdrawal and laundering of the aforecited \$ 3 billion, but also for the development and implementation of additional international fraud to provide cover for theft 23.12.2013 of \$ 3 billion from the National Welfare Fund of the Russian Federation.

VTB Capital and National Bank of Ukraine, by means of corruption and manipulation with documents, concealment, forgery and falsification of documents from the side of Governments of the Russian Federation and Ukraine are creating on the international level the conditions for recognition without a court decision aforementioned fraud as the sovereign debt of Ukraine and form international pressure for payment by Ukraine to Russia \$ 3 billion, which the Ukrainian people never enjoyed, but these money was stolen, and until now no National Bank of Ukraine, no single agency of Ukraine has not reported and not confirmed, that at least 1 cent from the \$ 3 billion has been spent on the needs of the Ukrainian people.

Created by **VTB Capital**, and National Bank of Ukraine the falsification of the government debt of Ukraine is more than \$ 3, 2 billion, that inflict damage to the people of Ukraine and violates my fundamental rights, and also violates the rights of US taxpayers, at the expense of which in Ukraine pay damages from this fraud (at the first at the expense of budget of Ukraine, and then - replenishment Ukrainian budget and defense capability at the expense of a big US financial aid), therefore I appeal for the protection to the court of the United States.

Detalization the scam and the role of the defendants in the organization of fraud and it concealment.

The growth of corruption and anti-people politics into the central authorities of Ukraine has forced people of Ukraine in the late of 2013 to conduct anti-government and anti-Russian protests, the construction of the revolutionary barricades and blocking the government district in the capital of Ukraine – Kiev, and the central power of Ukraine, frightened by the rapid change of power and the loss of influence, have decided before escaping to Russia, to use their power for the double punishment of the Ukrainian people:

1. Together with the central power of Russia to use as yet under control state financial institutions of Ukraine for the realization of international the scam for the withdrawal and money laundering \$ 3 billion from the National Welfare Fund of the Russian Federation and falsified documents in order to this fraudulent transfer money of the National Welfare Fund of the Russian Federation through the National Bank of Ukraine have been recognized as the sovereign debt of Ukraine.

2. To force the people of Ukraine not only to compensate the \$ 3 billion of fraudulent debt for Russia but also to force the Ukrainian people pay an additional \$ 300 million of bonuses to Russia during 2 years after escaping to this country (Russia) officials - crooks.

Thus, the withdrawal and laundering money in Ukraine \$ 3 billion of National Welfare Fund of the Russian Federation have been planned not as financial assistance to the Ukrainian people, but against its interests for the purposes and needs eloped in Russia the higher officials of Ukraine.

Key performers such anti-national the scam have become **VTB Capital**, National Bank of Ukraine and the National Police of Spain, each of which executed next role:

1. The main organizer of fraud - **VTB Capital**, (the main owner of the bank - Russia) and also the London office of the bank - **VTB Capital**. As a reward for successful and unpunished systematic fraud with bonds - pacifiers of Ukraine in the amount of \$ 3 billion on the Irish Stock Exchange the London office **VTB Capital** illegally has received \$ 450,000 from the budget of Ukraine.

Detalization of the role and the facts of violations by VTB Bank are set out below, page 3-5.

2. The role of the National Bank of Ukraine. The National Bank of Ukraine in several days before placing the bonds - pacifiers of Ukraine on the Irish Stock Exchange has received into its account to \$ 3 billion from the National Welfare Fund of the Russian Federation and by using its status lack of control by the government of Ukraine, that established by the Law of Ukraine "About the National Bank of Ukraine" secretly sends this \$ 3 billion to launder and conceals already 2 years all traces of their further movement. National Bank of Ukraine has successfully fulfilled its role and \$ 3 billion from the National Welfare Fund of

the Russian Federation, which came on the account of the National Bank of Ukraine 23.12.2013 (this date has publicly has confirmed Prime Minister of the Russian Federation Dmitry Medvedev) several days before the placement of bonds of Ukraine in Listing Irish Stock Exchange really are gone without a trace. Detailization of the role and violations of the National Bank of Ukraine are set out below, page 5-6.

3. The role of the National Police of Spain - elimination from the investigative actions in Ukraine of the main witnesses of this financial scam by the arrest in Spain of government officials of Ukraine, involved to the money laundering and concealment of \$ 3 billion. Therefore, Prime Minister N. Azarov to avoid possible arrest abroad 28.01.2013 suddenly and voluntarily sends in the resignation and is hiding in Russia and the Minister of Finance of Ukraine Yuri Kolobov for insulation as the main witness of the investigations in Ukraine, has been arrested by Spanish police and already a year of his hiding from the Ukrainian justice in prison in Spain at the expense of the taxpayers of Spain. Thus, the National Police of Spain provides a guarantee of concealing large financial crime against the Ukrainian people.

Detailization of the role and violations of the National Police of Spain are set out below, page 7.

Detailization the role and violations of VTB Capital

19.12.2013 Russian President Vladimir Putin has publicly stated, that Russia grants Ukraine \$ 15 billion from reserve of the Government from the National Welfare Fund of the Russian Federation, on commercial terms, 5% interest on the coupon. Also in the statement, Putin was named the main conditions of the transaction on the allocation of the above financial aid, which, according to him, the Ukrainian side has put forward for Russia:

1. Fulfill the requirements of the Ukrainian side that the manager of this transaction was **VTB Capital**.
2. Fulfill the requirements of the Ukrainian side that the transaction (placing Ukrainian securities loan) was held on the Irish Stock Exchange

V.Putin additionally emphasized that choice of manager of the transaction - the bank **VTB Capital** belongs to Ukraine, not Russia.

However, Putin's public statement about the main condition of the transaction, advanced by Ukraine to appoint a manager of the transaction **VTB Capital** - this public deception. The proofs of this deception of Putin are:

1. The absence of any official document, confirming that **VTB Capital** was invited by the Ukrainian side. Of such a document had no before and has not arisen after the public statement of Vladimir Putin.

2. The presence of a number of significant documents, disproving legality of attracting **VTB Capital** as manager of the transaction.

On the fact of illegal participation **VTB Capital Plc.**, from the Ukrainian side on the Irish Stock Exchange The Ukrainian Security Service in September 2014 opened a criminal case and announced in tracing the Minister of Finance of Ukraine Yuriy Kolobov who was the chief curator of the transaction with the Ukrainian side by the withdrawal and money laundering \$ 3 billion from Russia.

Evidences the misappropriation of status representative of Ukraine by **VTB Capital Plc.**, the following:

1. The Ukrainian government has never taken a decision on attracting **VTB Capital Plc.**, for the placement of bonds of public debt of Ukraine. Decision-making on the range of issues accordance with the Constitution of Ukraine are within the exclusive competence of the Government of Ukraine. But 19-20 December 2013 meeting of the Government of Ukraine are not carried out, and therefore could not be accepted by any legal decision.

2. Before December 19, 2013 was issued a Resolution of Cabinet of Ministers of Ukraine dated December 18, 2013 №904 «On public external borrowing in 2013», signed personally by N. Azarov, in which is nowhere indicated that **VTB Capital**, **VTB Capital Plc.**, and other divisions of the Russian VTB Group attracted to the placement of bonds .(document №3 attached).

3. Also no instruction of the Government of Ukraine about proper legal executed powers of attorney for the structure of **VTB Capital**, still more, for the private commercial structure **VTB Capital Plc., (London)** to act on behalf of the Government of Ukraine when placing Ukrainian bonds on the Irish Stock Exchange.

4. To the withdrawal \$ 3 billion from Russia under the guise of state loan of Ukraine by the central power of Russia and Ukraine intentionally was not created any interstate agreement none in December 2013, none to the present day and even does not exist exchange of letters on this subject. Accordingly, VTB Capital Ltd nor been mentioned no into single interstate document(document №5 and document №7 attached.

5. Still more, **VTB Capital Plc**, illegal way without competition and tender using the status of a swindler and an impostor instead of honest work on placement of Ukrainian bonds at the amount \$ 3 billion. on the Irish Stock Exchange has introduced corruption scheme of falsification Ukrainian bonds. So, perhaps with the help of bribes for the Irish Stock Exchange, it managed to Ukrainian bonds worth \$ 3 billion to make a pacifiers. Placed in the Listing of Irish Stock Exchange Ukrainian bonds were 24.12.2013 and their nobody has purchased the 24.12.2013 and has left unpaid until now (document №12 attached).

6. Still more, In February 2014 on the Irish Stock Exchange has arisen repeated the scam with Ukrainian bonds. Irish Stock Exchange autocratically in listing places information about additional sale of Ukrainian bonds worth \$ 2 billion, but such bonds to the stock exchange operator transaction **VTB Capital Plc**,.. does not provide. The bonds to the stock exchange have not been provided because the Ukrainian government has not issued such bonds at the moment of their placing in Listing Irish Stock Exchange. That is, again on the Irish Stock Exchange with the filing of **VTB Capital Plc**,.. were placed bonds - pacifiers. Such fact, in February 2014 was officially recognized by the Irish Stock Exchange and Irish Stock Exchange has apologized before the clients for this "mistake".

The above arguments enough evidenced by, that all the actions of **VTB Capital** and **VTB Capital Plc**,.. on behalf of Ukraine were illegal and unauthorized.

Also, actions of VTB Bank and **VTB Capital Plc**,.. have helped and help conceal the criminal actions by the government of the Russian Federation, committed for the purpose of fraud with the withdrawal and the laundering of money \$ 3 billion from the National Welfare Fund of the Russian Federation **VTB Capital Plc**,.. as the self-appointed executor of the transaction with \$ 3 billion. on the Irish Stock Exchange, based on the statement of Vladimir Putin about its key role, apparently, could to get access to all documents from the Russian side for the preparation of a stock exchange transaction and could not do not to know, that at the time of placement of Ukrainian bonds on the Irish Stock Exchange pay from the National Welfare Fund would be unlawful (Document №11 attached), However, any anti-corruption measures from its party has not been undertaken, whereby was violated the UN Convention against Corruption.

Detalization the illegality of the payment from the National Wealth Fund of Russian Federation for Ukrainian bonds on the Irish Stock Exchange.

In December, 2013 the National Welfare Fund of RF has not received legal permission to act on behalf of the Government (запрос), so the transfer of \$ 3 billion from National Wealth Fund of RF to the National Bank of Ukraine with absence such legal permission - this is not provide direct loans to the Ukrainian government, but the fact of fraud with the withdrawal and the laundering of money \$ 3 billion from the National Welfare Fund of the Russian Federation.

Minister Finance of Russian Federation Anton Siluanov to not to commit forgery of documents for getting by National Welfare Fund of the Russian Federation to act on behalf of the Government, using incompetence or bribing the mass media, are misleading publicly international community, by stating, that for withdrawal \$ 3 billion has been released and approved the document, which allowed to pay for Ukrainian bonds from the National Welfare Fund of the Russian Federation. But this document is not and has never been. (document №16 attached).

Refutation of statement of the Minister of Finance of the Russian Federation A. Siluanov.

In December 2013 adopted the Federal Law of 26.12.2014 N 449-FL "On introducing amendments to the Budget Code of the Russian Federation" allowing up to 10% of funds of the National Welfare Fund direct to the banks for financing infrastructural self-supporting projects.

However, any self-supporting infrastructural projects in accordance with such law from Ukraine was not offered and there is no such offer even now.

Also this law allowed to withdrawal 10% funds of the National Welfare Fund to the Russian banks on the basis of decisions of the Government of the Russian Federation. Said means in the decision of the Government of the Russian Federation can be placed in Russian banks in subordinated deposits (in subordinated bonds of the banks).

But any decisions of the Russian Government for the withdrawal funds of National Welfare Fund of RF to the Ukrainian banks do not.

Still more, earlier, before the adoption the above Federal Law In December 2013, Prime Minister of Russian Federation Dmitry Medvedev signed a Resolution from December 19, 2013 №1194, altering the order of placement funds of the National Welfare Fund of RF, in debt obligations of foreign states. According to this document invest funds of the National Welfare Fund of RF in foreign bonds from now

allowed on the basis of separate decisions of the government of the Russian Federation, which makes it possible to invest in the securities of the states "with a higher level of risk."

However, this resolution does not resolve the problem of investment of means of National Welfare Fund of RF in Ukrainian bonds, because the placement of funds can be carried out only on the basis of separate acts of the Government of the Russian Federation, containing the appropriate instructions to the Ministry of Finance of Russian Federation about the placement of funds of National Welfare Fund of RF in debt obligations certain of the state with indication the type of instrument, the volume of placements of means, the currency in which liabilities are denominated, term of placement and other significant indicators.

Based on the foregoing arguments about the absence at the VTB Capital Plc. any the powers to represent the interests of the Ukrainian government when placing bonds of external borrowing, and also the absence at the National Welfare Fund of the Russian Federation of any permissions to buy Ukrainian foreign borrowing, **VTB Capital Plc.**, using the right of co-operation with the Irish Stock Exchange, has appropriated full powers of the Ukrainian and Russian government and organized the corrupt fraud on the Irish Stock Exchange for the withdrawal and laundering in Ukraine \$ 3 billion from National Welfare Fund of the Russian Federation.

As a result, 23.12.2013 \$ 3 billion of National Welfare Fund of the Russian Federation entered into National bank of Ukraine and have disappeared. And only after a few days after transferring \$ 3 billion to Ukraine, no earlier than 24.12.2013, Ukrainian bonds worth \$ 3 billion were placed on the Irish Stock Exchange listing, which remained unpaid according to stock exchange rules and have also disappeared.

However, at the Ukrainian government in key positions in the Ministry of Finance of Ukraine, National Bank of Ukraine have remained accomplices, who apparently took part in the looting of \$ 3 billion and as accomplices, not only conceal the essence of the fraud, but also provide:

1. Illegal payment of services for the organization of the above scam by **VTB Capital Plc.**, in the amount of \$ 450,000 from the budget of Ukraine. **VTB Capital Plc.**, did not return these funds, confirming thereby, that it was payment to him for systematic fraud on the Irish Stock Exchange, but not for a fair deal on the stock exchange.

2. Illegal systematic coupon payments on the above bonds – pacifiers, the amount of which has already reached \$ 300 million.

National Bank of Ukraine carefully concealing information about coupon payments for bonds - pacifiers (document №15 attached).

Detalization the role and the facts violations of the National Bank of Ukraine.

1. The National Bank of Ukraine does not obey the Government of Ukraine in accordance with Ukrainian legislation (Article 51 of the Law of Ukraine "About the National Bank of Ukraine.") So, not having an interstate agreement about borrowing by Ukraine of the money of National Welfare Fund of the Russian Federation (Document №6 attached), received 23.12.2013 money \$ 3 billion from National Welfare Fund of the Russian Federation, has used its right to dispose of the received funds without agreed state conditions in its sole discretion and not informing the Government of Ukraine.

2. National Bank of Ukraine, as a participant of financial fraud is acted secretly: received \$ 3 billion from Russia and secretly and secretly sent them to the needs of the Ukrainian corrupt authorities and not on the needs of the Ukrainian people, by creating a status for these \$ 3 billion as the odious debt.

3. The policy of secretly from the people the National Bank of Ukraine continues to conduct until today, by refusing implement the UN Convention against Corruption and to eliminate the consequences of corruption scheme. In particular:

- conceals, how and by whom has been exchanged received dollars for the hryvnia
- conceals, where has disappeared currency, if exchange of currency there were no and currency reserves are not have replenished at such amount

4. To hide tracking the status of \$ 3 billion as the odious debt illegally evades to make a report for the 2013-2016 year before the Verkhovna Rada of Ukraine concerning , where were sent the money and based on what documents, that is a corrupt violation of Article 51 of the Law of Ukraine about accountability "About the National Bank of Ukraine."

5. Since nor the National Bank nor the Government of Ukraine did not inform the people of Ukraine since December 2013 on the implementation of at least one social project for the people, which would be financed by the \$ 3 billion. received from the National Welfare Fund of the Russian

Federation, this fact is evidence, that the National Bank of Ukraine has disposed received into its account 23.12.2013 \$ 3 billion. from the National Welfare Fund of Russian Federation, contrary to the public joint liabilities of the President of the Russian Federation VV Putin and President of Ukraine VF Yanukovych about the social and humane purposes withdrawal \$ 3 billion from National Welfare Fund of the Russian Federation.

6. However, in spite of a rough discrediting by the NBU public liabilities of higher officials of the states, neither the President of the Russian Federation VV Putin, nor Ukrainian Prime Minister AP Yatsenyuk, nor the National Bank of Ukraine, nor VTB bank no steps have been made to correct the violation of public liabilities and corruption when using of \$ 3 billion from National Welfare Fund RF and return the money in the interest of the people but not scammers. Such a circular inactivity, even in a difficult economic situation in Russia and Ukraine confirms the fact that is initially from the side of Russian President Vladimir Putin and President of Ukraine VF Yanukovych was scheduled corrupt plan for the withdrawal and money laundering in Ukraine at the sum of \$ 3 billion from National Welfare Fund of the Russian Federation and National Bank of Ukraine successfully not only its implemented, but also continue to use its official position to conceal corruption and aferizm.

7. Since none the National Bank of Ukraine nor the Government of Ukraine did not inform the people of Ukraine since December 2013 on the implementation of at least one economic project to the benefit of the people, which would be financed at the expense of received from National Welfare Fund of the Russian Federation \$ 3 billion, this fact also indicates that that \$ 3 billion from National Bank were sent to the needs of runaway from Ukraine higher officials, rather than the needs of the people.

8. About participation in the scam and awareness of its role evidenced by the fact that the National Bank of Ukraine used the status of non-interference into its activities and when receiving \$ 3 billion 23.12.2013 not only has hidden from the people of this fact, but also did not make a request to the National Welfare Fund of the Russian Federation order to find out, why the National Welfare Fund of the Russian Federation sent these money as a gift to Ukraine, and not as a loan, since 23.12.2013 Ukrainian bonds on the Irish Stock Exchange has not yet been posted in the listing.

Thus, **VTB Capital** in collusion with the National Bank of Ukraine, who has used the status of non-interference in its activities in accordance with Art. 53 of the Law of Ukraine "About the National Bank of Ukraine", (Article 53. Guarantees of non-intervention) jointly have used official position in the interest of escaped to Russia corrupted power of Ukraine, but against the interests of the people and in violation of its rights and my rights, have created untrammeled and stealthy from the people scheme withdrawal of money from the Russian Federation and laundering them in Ukraine.

For maximal isolation of a key witness to the above financial scam with \$ 3 billion - Minister Finance of Ukraine Yuriy Kolobov Russia did not let to the territory of the Russian Federation, apparently having offered refuge in Spain.

I went to the head of Spain to help the Ukrainian people to step up anti-corruption measures to search Y.Kolobov, and the head of Spain highly appreciated my aspiration to fighting corruption (Document №10 attached) and within a month Yuriy Kolobov was found in a remote village of Spain and had been arrested.

Capture and arrest of the disappeared key witness Yuriy Kolobov did not leave for me any doubt, that corruption scheme withdrawal and laundering of \$ 3 billion from National Welfare Fund RF would be unmasked at the international level, but officials will carry criminal punishment for corruption.

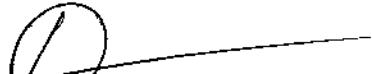
However, instead of activation of anti-corruption measures, and the sword of justice against thieves the National Police of Spain has become a reliable shield for thieves and corrupt officials. By dint of Spanish police Yuri Kolobov an even more reliably hidden from any investigations.

Detalization the role of the National Police of Spain in the concealment corruption scam to launder \$ 3 billion of National Welfare Fund of the Russian Federation

1. The National Police of Spain during 2015-2016 after the arrest of the former Minister of Finance of Ukraine Yuri Kolobov Spain took no action to address the effects of corruption, thus violating Article 34 of the UN Convention against Corruption, namely:

1.1. Does not send any claims and demands to the central authorities of Ukraine on the fact of delaying public extradition a key witness and sabotage the investigation (document №13 attached).

1.2. Inflicting damage to the budget of Spain, using taxpayers' money of Spain to maintain Yuriy Kolobov.



1.3. Does not take any measures to compensate for the costs by guilty persons, which delays of extradition.

1.4. Inflicting damage to the image of Spain, where scammers can at the expense of Spanish taxpayers hide foreign organizers of major international financial crimes from the wrath of the people.

1.5. Has used its official position to conceal corrupt inactivity of the General Prosecutor's Office of Ukraine, which has not fulfilled the court's decision of Spain about the extradition Yuriy Kolobov within 40 days.

Thus, the National Police of Spain, using its official position for the isolation key witness, taking into account the fact of escaped from the wrath of the Ukrainian people to the Russia of other Ukrainian officials, fulfilled the main role in blocking procedure of investigations in Ukraine and Russia, which resulted to serious consequences.

1. The consequences of concealing by the Spanish National Police corrupt scam to launder \$ 3 billion from the National Welfare Fund of the Russian Federation in Ukraine:
2. Continues falsifying documents for hiding the scam.
3. Do not brought to justice for organizing such the scam officials from the Government of Ukraine and Russia.
4. The people of Ukraine have not received not a single cent from the \$ 3 billion from the National Welfare Fund of the Russian Federation, because all the money were stolen by the organizers of scam.
5. Do not brought to justice nor **VTB Capital**, nor National Bank of Ukraine for the use of official position, corruption and aferizm.
6. Swindlers for the withdrawal and laundering \$ 3 billion of the National Welfare Fund of the Russian Federation have remained still not punished but was punished and being punished the people of Spain, Ukraine and the US taxpayers, forcing of some to serve and contain swindlers, and other pay back semi-annually coupon payments of \$ 75 million (more than 0.2% of the total state budget of Ukraine) and American taxpayers compensate the losses by the money from the US federal budget.

25.01.2016 US Congressional Budgetary Bureau has published new projections according to which in the next ten years, the US federal government debt could reach \$ 30 trillion. And systematic elimination of the consequences of the above described scams in Ukraine at the expense of US taxpayers in the 2015-2016 significantly affect the increase in the international debt of the United States and, accordingly, the participants scam - **VTB Capital**, the National Bank of Ukraine and the National Police of Spain violate the fundamental rights of every citizen of the United States (document №14 attached).

The abovementioned facts and arguments testify not only about corruption violation by **VTB Capital** the National Bank of Ukraine and the National Police of Spain my fundamental rights and rights citizens of Ukraine, the USA and Spain, and also the severe consequences from such violations, but also indicates, that the acting central power of the Russian Federation together with to escape to Russia the central power of Ukraine and the remaining accomplices on posts of power in Ukraine hide from exposing the true status of the \$ 3 billion of National Welfare Fund RF as odious debt.

Based on international practice and judicial precedents, that state debt the taken by the regime of the country not for the national purpose, but for own support, can be not recognized by the debtor after the overthrow indicated regime and further such debt is considered the debt of regime, but not countries - odious debt. By me during the investigation of corrupt scheme was established a number of facts and signs of that \$ 3 billion of NWF Russian Federation - is odious debt.

Brief detailization evidences that \$ 3 billion of National Welfare Fund RF is not for the people of Ukraine.

1. The negotiations with Russia on the financing were contrary to the nation-wide anti-Russian protests in Ukraine.
2. The fact of change of power in Ukraine in December 2013 was obvious, therefore the power before the overthrow implemented a financial scam with \$ 3 billion, calculating that at the time of the revolution will be lost evidences.
3. The power of Ukraine have started to run from the Ukraine after 4 weeks after receiving a \$ 3 billion of NWF Russian Federation.
4. Money in the amount of \$ 3 billion of National Welfare Fund RF disappeared and the Government of Ukraine and Russia have not yet been informed, where has been spent \$ 3 billion from Russia.

5. Reporting about movement of \$3 billion of National Welfare Fund RF does not have any one central authority of Ukraine since 2013.
6. All documents to transfer \$ 3 billion of NWF RF to Ukraine been falsified or not made In accordance with the laws.
7. Investigations into the facts of falsification of documents for withdrawal and laundering \$ 3 billion NWF RF are not carried out nor Ukraine or Russia, neither in Spain nor in Ireland (document №9 attached).
8. The Central Bank of Russia to hide the stock scam of **VTB Capital** based on the activation of my investigations(document №8 attached) at the end of 2015, made the decision to cancel the license to perform depositary operations on the basis of the statement of **VTB Capital**.
9. Higher officials of Russia are creating a public myth about the status of the financial scam with \$ 3 billion of NWF Russian Federation as a state debt of Ukraine.
10. International institutions, using falsified documents constitute false reports and expert assessments concerning the status of \$ 3 billion of National Welfare Fund RF.

Considering stated by me all the facts , the arguments and documents about corruption and violation of my rights, violations of the laws on the part of VTB Capital, the National Bank of Ukraine and the National Police of Spain and also to protect the rights of US citizens from financial damages and consequences of corruption, based on the laws:

- Foreign Relations Authorization Act
- UN Convention against Corruption 2003
- Convention of the Organization of Economic Cooperation and Development on Combating Bribery of Foreign Public Officials in International Business Transactions 1997
- Universal Declaration of Human Rights
- False Claims Act 1863
- Wall Street Reform and Consumer Protection Act 2011
- Foreign Corrupt Practices Act 1977
- The Freedom of Information Act (FOIA)
- The Money Laundering Prosecution Improvement Act – MLPIA

I ASK TO THE COURT:

1. To recognize the actions of the National Bank of Ukraine and VTB capital by such that violate my rights in the fight against corruption, envisaged by requirements p. 2 of Art. 9 about managing public finances and Article 10 about Public Reporting of UN Convention against Corruption 2003.

2. To recognize as violation the requirements of Art. 34 of the UN Convention against Corruption, 2003 about the elimination of the consequences of acts of corruption inactivity of VTB Capital, the National Bank of Ukraine and the National Police of Spain concerning the eliminating systemic corruption violations when providing \$ 3 billion of financial assistance to Ukraine from the National Welfare Fund of the Russian Federation.

3. For systemic violation of the UN Convention against Corruption 2003 and failure to take measures against corruption in the structures of VTB Capital, participation and concealment of the international financial scams, blocking public anti-corruption initiatives, that together lead to a breach by VTB Capital of the fundamental rights of my and the citizens of Ukraine and the US, annul or stop the international banking license of VTB Capital in order to force VTB Capital to eliminate systemic corruption violations, committed by VTB capital when providing \$ 3 billion. financial assistance to Ukraine from the National Welfare Fund of the Russian Federation and carry out reconstruction the internal anti-corruption policies on open and responsible.

4. To oblige the National Bank of Ukraine, together with representatives of the National Police of Spain with my obligatory participation carry out measures to establish all the facts of using the money in the amount of \$ 3 billion of financial assistance to Ukraine from the National Welfare Fund of the Russian Federation for the needs of escaped to Russia Ukrainian power, but not for the needs of Ukrainian people and conduct an audit of the exact date and time of receipt of money in the National Bank of Ukraine selling on the foreign exchange market for the getting of national currency - hryvnia, transferring it to the State Treasury of Ukraine reliability of the further use of these funds.

The list of documents that are attached to the COMPLAINT :

1. APPLICATION TO PROCEED WITHOUT PREPAYING FEES OR COSTS.

2. A copy of the passport of citizen of Ukraine - Ruslana Olegovna Bronina.
3. Document №3: A copy of the falsified resolution of Cabinet of Ministers of Ukraine dated December 18, 2013 №904 «On public external borrowing in 2013», signed personally by N. Azarov (1p.)
4. Document №4: A copy of the statement of R. Bronina from 29.10.2014 to the Prime Minister of Ukraine Arseniy Yatsenyuk and Russian President Vladimir Putin on the termination of forcing upon of corrupt debt to Ukraine (2 p.)
5. Document №5: A copy of reference from the Ministry of Foreign Affairs of Ukraine number 913 / 36-172 / 3-1672 from 19 November 2015 about the absence of an Interstate agreement between Russia and Ukraine about the state loan of \$ 3 billion in December 2013 (1 p.)
6. Document №6: A copy of reference from the National Bank of Ukraine №18-02013 / 87541 from 13 November 2015 addressed to the R. Bronina about the absence of an Interstate agreement between Russia and Ukraine about the state loan of \$ 3 billion in December 2013 (1 p.)
7. Document №7: A copy of reference from the Presidential Administration of Ukraine №12-08 / 1713 from 13 November 2015 addressed to the R. Bronina about the absence of an Interstate agreement between Russia and Ukraine about the state loan of \$ 3 billion in December 2013 (1 p.)
8. Document №8: A copy of the letter from the Central Bank of the Russian Federation №10-1-4/2432 from 18.03.2015, addressed to the R.Bronina about illegal banking financial manipulations and the scams, including in the implementation of financial assistance Russia for Ukraine in the amount of \$ 3 billion. (1 p.)
9. Document №9: A copy of the response from January 21, 2016 from the Irish Stock Exchange to Bronina Ruslana with signs of concealment of corruption and public information about date of placement of Ukrainian bonds in the listing of Irish Stock Exchange not earlier than 24.12.2013 (1p.)
10. Document №10: A copy of the letter the Head of Spain from 23 February 2015 about supporting of the anti-corruption activities by Bronina Ruslana (1p.)
11. Document №11: A copy of the anti-corruption statement №0151125074 from 29.12.15 to the Chairman and CEO of VTB Capital,. AL Kostin about the concealment of corruption in the structures of VTB Capital (1p.)
12. Document № 12: A copy of the anti-corruption pre-trial inquiry to the Chairman and CEO of VTB Capital,. AL Kostin № 01512448447 from 24.12.15 about elimination of consequences of corruption and the return from VTB Capital \$ 450 million to the budget of Ukraine (1p.)
13. Document №13 A copy of the anti-corruption inquiry to the Prime Minister of Ukraine AP Yatsenyuk and Minister of Internal Affairs of Ukraine AB Avakov № 0160202148 from 25.01.2016 about the role of the National Police of Spain in isolation witnesses for the benefit of crooks (1p.)
14. Document № 14: A copy of the response of the Head of the US Senate Committee, Senator Orrin Hatch from 28.11.2015 that he had received appeals from R. Bronina with the proposal to support anti-corruption work to protect of US taxpayers from fraud of the National Bank of Ukraine and the Government of the Russian Federation in agreement with the President of the Russian Federation VV Putin (2 p.)
15. Document № 15: A copy of the anti-corruption inquiry R. Bronina from 23.12.2015 addressed to the Head of the National Bank of Ukraine about concealment and corruption when charity transfer by Russia 23.12.2013 \$ 3 billion to the bank account of National Bank of Ukraine (1 p.)
16. Document № 16, a copy of the pre-trial inquiry from Ruslana Bronina from 11.12.15 to the President of the Russian Federation VV Putin to confirm or refute the accusations about the absence of interstate agreement about financial assistance amounting to \$ 3 billion, received by Ukraine in December 2013(1 p.)

Date: 01.02.2016

Plaintiff:
Bronina Ruslana Olegovna

Tel. +38067 398-80-57

ЕР 265440



паспорт громадянина України
паспорт гражданина Украины

Броніна
Прізвище
Руслана
Олегівка
по батькові
18 вересня 1990 року
Дата народження
місто Іршава ІУК
Місце народження
Івано-Франківської області

Таня

Підпись власника паспорта

Doc N 3



КАБІНЕТ МІНІСТРІВ УКРАЇНИ ПОСТАНОВА

від 18 грудня 2013 р. № 904
Київ

Про здійснення державних зовнішніх запозичень у 2013 році

З метою виконання Закону України “Про Державний бюджет України на 2013 рік”
Кабінет Міністрів України **постановляє:**

1. Здійснити державні зовнішні запозичення шляхом випуску облігацій зовнішньої
державної позики 2013 року (далі - облігації).
2. Затвердити Умови випуску облігацій зовнішньої державної позики 2013 року, що
додаються.
3. Міністерству фінансів:
здійснити випуск облігацій згідно із затвердженими цією постановою Умовами;
під час складання проекту Державного бюджету України на відповідний рік
передбачати кошти для погашення та обслуговування облігацій.

Прем'єр-міністр України

М.АЗАРОВ

Інд. 70

Doc №4



Coalition of anti-corruption organizations Public Court of Ukraine

03087, Ukraine, Kiev, Post box 27, tel.: +38 067 398-80-57.

e-mail: blacklisteu@mail.ru

ДЛЯ РОЗГЛЯДУ НА ЛЮСТРАЦІЙНИЙ КОМІСІЙ

№15046 от 29.10.14

Премьер-Министру Украины А.П.Яценюку

Копия: Президенту Российской Федерации В.В. Путину

Заявление о прекращении коррупционных схем навязывания долгов Украине и преступной бездеятельности финансовых учреждений

17.12.2013 р. Президент Российской Федерации В.В.Путин и Президент Украины В.Ф. Янукович договорились о предоставлении Украине кредита в размере 15 миллиардов долл. без чётких программ и проектов их использования, тем самым, заложив основы для безнаказанного его разворовывания по коррупционным схемам.

Члены Коалиции антикоррупционных организаций Общественный Суд Украины (далее - КАО ОСУ) в рамках проекта «Чёрный список антиславян» провели расследования о финансовых махинациях путём предоставленного кредита для Украины и выявили схему по перекачке и отмыванию денег через Украину: деньги из России под видом кредитования выводятся в Украину, а затем мгновенно скрытно и бесконтрольно трансформируются уже в частный капитал, используя для этого государственный ресурс финансовых учреждений и продажных коррупционеров - чиновников финансовых учреждений. В результате - государство Украина не только возмещает уворованные по сговору кредитные средства, но еще и огромный % в размере около 250 млн.долл. Ранее подобное «финансирование» Украины осуществлял ЕБРР (к примеру, на фиктивно построенных за их деньги автодорогах сейчас массово бастуют водители из-за непроходимости и развала таких «отремонтированных» дорог. В итоге - дорог нет, а многомилиардный долг у государства есть.) А теперь и с Востока под надуманным поводом навязывают Украине долги уверенные в безнаказанности Министр финансов России А.Силуанов по сговору с высшими должностными лицами Украины, руководители правительства Украины Николая Азарова-Сергея Арбузова, а именно: в декабре 2013 осуществлен вывод 3 миллиардов долларов из России, которые Янукович по сговору с главой НБУ Соркиным и главой Минфина Украины обналичат, а деньги вывезутся из Украины как частный капитал. Денег нет, зато есть новейшее вооружение боевиков на Донбассе, Януковича нет, зато у украинской армии осталось ржавое оружие, а Россия, приютив Януковича, требует не только 3 млрд.долл., но еще и расчитывает, что за такую махинацию Украина должна платить огромные % (сотни млн. дол.) Уже в декабре 2014 Россия ждет от Украины унизительные для Украины уворованные средства за обслуживание воровства коррупционного долга, а к декабрю 2015 - полной оплаты.

Doc №4

Наши расследования показали, что у Российской Федерации нет доказательств, чтобы опровергнуть наши обвинения. Деньги РФ направила в Украину не для укрепления ресурсов украинского народа, а для личного обогащения членов команды Януковича как плату и поощрение за ослабление и развал страны, за избиение и запугивание украинцев.

Доказательства с нашей стороны.

1. Никто из чиновников Минфина Украины не предоставил отчет об использовании 3 миллиардов долл., полученных от России под большие % (500 миллионов долларов)

2. В Украине ни копейки из этих средств не направлялось на финансирование реальных программ развития Украины.

3. Не был проведён финансовый аудит Минфином Украины. Более того, служба финансового мониторинга Украины, финансспекция преступно уклоняется от расследований.

Исходя из вышеизложенного, заявляем:

1. Украина не имеет права оплачивать коррупционные схемы, не опровергнув вышеуказанные обвинения.

2. РФ не имеет права требовать оплаты за коррупционные махинации, пока не будут предоставлены доказательства, что деньги не были разворованы режимом Януковича.

Требуем:

1. От Генеральной прокуратуры РФ, Следственного комитета РФ, Генеральной прокуратуры Украины привлечь к уголовной ответственности руководителей финансовых учреждений за создание финансовой коррупционной схемы по выводу из России денег налогоплательщиков России, за воровство которых затем принуждают платить украинский народ да еще с большими процентами.

2. Возбудить уголовные дела за укрывательство и пособничество в сокрытии финансовых преступлений против участников коррупционной схемы расхищения средств, которые, возможно, покрываются Минфином Украины.

3. Допросить Януковича и причастных руководителей Минфина, которые не только скрывают преступления, но и надеются на продолжения воровства денег как в РФ та и в Украине. Опубликовать показания, как эти патриоты Украины и России «облапошили» Россию.

КАО ОСУ не даст облапошить Украину!

Мы готовы направить экспертов для выявления коррупционных схем на территории России и Украины.

ГСУ заявляет о необходимости углубленной люстрации в Минфине Украины и призывает Президента Украины, а именно :

1. К люстрации и привлечению к ответственности чиновников, которые признают вышеобозначенный кооррупционный долг, который навязывается Украине.

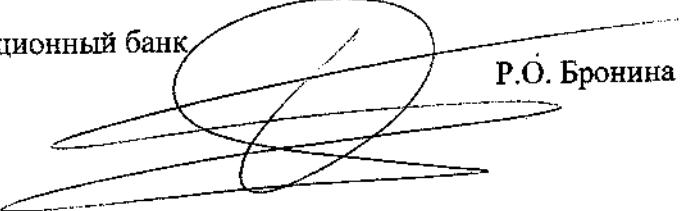
2. Направить официальное письмо руководству РФ о непризнании долга в размере 3 миллиардов долларов как такого, что является коррупционным и не подлежит оплате согласно международных норм борьбы с отмыванием денег.

З миллиарда долл. мы считаем необходимым направить на укрепление обороноспособности Украины и помочи пострадавшим от военных действий.

Обращение о поддержке настоящего заявления и организации общественного движения: «Коррупционные долги - Украина не платит!» мы направим к патриотическим организациям Украины и России , а также общественным деятелям.

С уважением,

Член Совета ОО «Информационный банк
«Киевская Русь»



P.O. Bronina

**МІНІСТЕРСТВО
ЗАКОРДОННИХ СПРАВ
УКРАЇНИ**



**MINISTRY
OF FOREIGN AFFAIRS
OF UKRAINE**

Михайлівська площа, 1
м. Київ, 01018, Україна

Тел.: (044) 238 17 48; факс: (044) 238 18 88
E-mail: zsmfa@mfa.gov.ua
Web: <http://www.mfa.gov.ua>
Код ЄДРПОУ 06026620

1 Mykhailivska Square
Kyiv, 01018, Ukraine

19 листопада 2015 р. № 913/36-172/3-1672
На лист АПУ № 12-06/1712 від
13.11.2015

**Виконавчому директору
«Міжнародного
антикорупційного суду»**

Doe N 5

P.Броніній

blacklisteu@mail.ru

**Копія: Адміністрація Президента
України**

Щодо затиту P.Броніної

Шановна пані Броніна,

МЗС розглянуло Ваш лист № 0159011255 від 04.11.2015, переадресований Адміністрацією Президента України, та у межах компетенції повідомляє про відсутність у Міністерстві інформації про зазначені у запиті міжнародні угоди.

**Заступник директора Департаменту
політики і комунікацій-
начальник Управління
зв'язків зі ЗМІ**

Олена Вашенко

НАЦІОНАЛЬНИЙ БАНК
УКРАЇНИ

вул. Пасічна, 1, м. Київ, 01033, Україна
тел. 050-781-11-00, факс 230-20-33, 230-20-34
e-mail: enquiry@nmbu.gov.ua

NATIONAL BANK
OF UKRAINE

9, Pashennaya Street, Kyiv, 01033, Ukraine
tel. +380 44 230-20-33, fax +380 44 230-20-34
e-mail: enquiry@nmbu.gov.ua

13.11.2015 № 18-02013/84564

Док №6

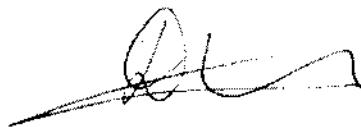
Благодійна організація
«Фонд «Міжнародні антикорупційні
суди»
м. Київ-87, а/с 27, 03087, Україна

Щодо договірних зобов'язань
Національного банку України
перед Російською Федерацією

Національний банк України за результатами розгляду запиту Благодійної організації «Фонд «Міжнародні антикорупційні суди», наданого 05.11.2015 №0159011257, з питання наявності Угоди про залучення Національним банком України кредиту від Російської Федерації у спеціальних правах запозичення (СПЗ) Міжнародного валютного фонду повідомляє, що безпосередньо Національним банком України така Угода з російською стороною не укладалась.

Заступник Голови

Д.Р. Сологуб



1449785

Війтєва (253 05 49)



Doc № 4

Адміністрація Президента України

Головний департамент забезпечення
доступу до публічної інформації

13.11.2015 № 12-08/1413
На № 2156 від 09.11.2015

Виконавчому директору
Міжнародного антикорупційного
суду

Р.БРОНІНЬ

03087, м. Київ-87,
а/с 27

Шановна пані Броніна!

На Ваш запит від 9 листопада 2015 року стосовно місцезнаходження міжнародної угоди між Україною та Російською Федерацією щодо надання позики повідомляємо, що згідно зі статтею 23 Закону України «Про міжнародні договори України» оригінали міжнародних договорів України зберігаються у Міністерстві закордонних справ України.

Відповідно до пункту 3 статті 22 Закону України «Про доступ до публічної інформації» Ваш запит надіслано належному розпоряднику інформації — Міністерству закордонних справ України.

Дякуємо за Ваш запит.

З повагою

Заступник Керівника Головного департаменту
забезпечення доступу до публічної інформації
Адміністрації Президента України

В.Петров

Doc №8

ЦЕНТРАЛЬНЫЙ БАНК
РОССИЙСКОЙ ФЕДЕРАЦИИ
(Банк России)

Административный департамент

107016, Москва, ул. Неглинная, 12

от 18.03.2015г № 10-1-4/2432

на № _____ от _____

Брониной Р.О.

blacklisteu@mail.ru

О рассмотрении обращения
Брониной Р.О.

11/2
2

Уважаемая Руслана Олеговна!

Ваше обращение, поступившее в Центральный банк Российской Федерации из Управления Президента Российской Федерации по работе с обращениями граждан и организаций, рассмотрено и принято к сведению.

Заместитель начальника
Управления документооборота

И.А. Семагин



28 Anglesea Street, Dublin 2, D02 X125
 Tel +353 1 637 4200
 Fax +353 1 677 6045
 info@ise.ie
 www.ise.ie



Ms Rūslana Bronina
 Executive Director
 International Anti-Corruption Court
 Post Box 27
 Kiev
 Ukraine 03087

21 January 2016

Dear Ms Bronina

Re: Ukraine Notes

I refer to your recent correspondence to Ms Deirdre Somers, Chief Executive of the Irish Stock Exchange plc (the 'ISE').

A number of debt instruments were listed by the Republic of Ukraine on the Main Securities Market ('MSM') of the Irish Stock Exchange between 2005 and 2013.

In relation to the specific questions set out in your correspondence, due to legislative confidentiality restrictions, I am unable to discuss the specifics of any individual issuer or its securities which is or was listed on the ISE. However, I have set out below some information which I hope will be of use to you.

In general, in respect of bonds listing on the MSM, the following regulatory requirements apply:

1. The ISE, as the competent authority for listing, reviews and approves an issuer's listed application to ensure that the conditions for listing set out in European Directive 2001/34/EC and the ISE Listing Rules are satisfied; and
2. The Central Bank of Ireland, as the competent authority under the European Prospectus Directive 2003/71/EC, reviews and approves the prospectus to ensure that the disclosure and other requirements of that Directive are satisfied. The institutions involved in the bond issuance and placement of bonds are detailed in the prospectus.

Once listed, an issuer is required to comply with the relevant requirements in the European Transparency Directive 2004/109/EC and the Market Abuse Directive 2003/6/EC (for which the Central Bank of Ireland is competent authority), and the relevant Listing Rules (for which the ISE is competent authority).



Doc N/10



PRESIDENCIA
DEL GOBIERNO

Jorge Moragas
SECRETARIO DE ESTADO

DIRECTOR DEL Gabinete
DE LA PRESIDENCIA DEL GOBIERNO

SECRETARIO DEL CONSEJO
DE SEGURIDAD NACIONAL

Madrid, 23 de febrero de 2015

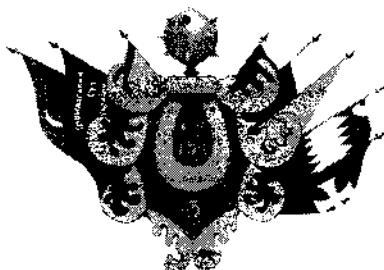
Sra. Rusiana Bronina
Co-Chief of Coalition of Anti-Corruption
Organizations
Public Court of Ukraine
Post Box 27
03087 KIEV (Ucrania)

Estimada Sra. Bronina:

En nombre del Presidente del Gobierno español acuso recibo del escrito que le ha dirigido recientemente y le agradezco la información que nos ha hecho llegar sobre nuevas medidas y tecnologías en la lucha contra la corrupción.

En ese sentido, le comunico que dicha información será estudiada con interés y detalle en el gabinete.

Reiterándole mi agradecimiento por su colaboración, reciba un cordial saludo,



International Anti-Corruption Court (IACC, ID 40019132)

03087, Ukraine, Kiev, Post box 27, tel.: +38 067 398-80-57,
e-mail: blacklisteu@mail.ru, eriip.com – member of CAO IACC

№ 0151125074 от 29.12.15

Президенту — Председателю правления Банк ВТБ
Костину А. Г.

Антикоррупционное заявление

Уважаемый Андрей Леонидович!

Во избежание отдельного судебного процесса в Федеральном суде США по аннулированию лицензии ВТБ Банка с последующими штрафными санкциями мы направили в Ваш адрес предсудебный запрос № 01512448447 от 24.12.15, где просили подтвердить свою готовность выполнять Конвенцию ООН против коррупции 2003 в части устранения последствий коррупции и корректировки деятельности с учетом необходимости использовать механизмы досудебного разрешения вопроса - причастности (или непричастности) центрального офиса ВТБ Банка в крупнейшей афере со стороны подразделения ВТБ Банка и украинского Правительства по превращению облигаций внешних заимствований Украины в размере 3 млрд. долларов США в биржевой листинг «мыльного пузыря» вместо государственных документов о заимствовании.

Российская Федерация на момент выпуска этих «мыльных облигаций» уже, по-видимому, не нуждалась в них, поскольку деньги в размере \$ 3млрд. уже были направлены в Национальный Банк Украины накануне, 23.12.2013 г. (днем раньше до дня размещения государственных облигаций Украины на Ирландской бирже, и это публично подтвердил лично Премьер-министр Российской Федерации Дмитрий Медведев), как благотворительная безвозмездная помощь Украине, а облигации, которые были выпущены после 24 декабря 2013 г, остались не оплаченными по сегодняшний день.

ВТБ Банк, взявший на себя роль оплаченного из бюджета Украины брокера на Ирландской бирже, фактически, организовал поговору с биржей выманивание мошенническим путем денежных средств из Фонда Национального благосостояния (ФНБ) Российской Федерации для Украины не как займа, а как подарка. Отсутствие межгосударственного соглашения создало все условия для разворовывания \$3млрд. денег благотворительного взноса России для Украины бывшим Правительством Украины, сбежавшем затем в Россию.

Отчет об использовании Украиной вышеупомянутых денег (\$3 млрд.) ни Азаров, ни новое Правительство Украины по сегодняшний день не предоставили и никаких мер по исправлению незаконности процедуры размещения на Ирландской бирже не было произведено, что подтверждает коррупционный умысел и говорят участников аферы.

Факт передачи таких неоплаченных облигаций с Irish Stock Exchange какому-либо лицу, кроме украинского Правительства, является воровством украинских ценных бумаг или незаконным захватом ценных бумаг для шантажа Украины. К сожалению, российские власти подтвердили группе Euroclear, что все это время с 24.12.2013г евробонды на 100% использовались российским Правительством.

Реакцию замалчивания центрального офиса ВТБ Банка вышеуказанной резонансной аферы мы можем расценивать как молчаливое признание прямого участия в биржевой афере и, соответственно, в иск против фигурантов такой аферы включить ответчиком Центральный офис ВТБ Банка, а не "VTB Capital plc".

С уважением,

Исполнительный директор Международного
антикоррупционного суда

«ФОНД „МІЖНАРОДНИ
АНТИКОРУПЦІЙНІ СУДИ“
“FOND INTERNATIONAL
ANTI-CORRUPTION COURT”

Р.Слана-Бронина



International Anti-Corruption Court (IACC ID 40019132)

03087, Ukraine, Kiev, Post box 27, tel.: +38 067 398-80-57,
e-mail: blacklisteu@mail.ru, eriip.com - member of CAO IACC

№ 01512448447 от 24.12.15

Президенту — Председателю правления Банк ВТБ
Костину А.А.

Антикоррупционный предсудебный запрос Уважаемый Андрей Леонидович!

Нами в процессе подготовки к судебной кампании в федеральных судах США по изобличению финансовых и биржевых афер и аннулированию лицензий был установлен факт крупного мошенничества подразделением ВТБ банка "VTB Capital plc" на Ирландской фондовой бирже в 2013-2014 гг., а именно:

1. Ирландская фондовая биржа только 24.12.2013 включила в листинг украинские евробонды на сумму \$3 млрд.
2. Оплата за украинские евробонды на \$3 млрд. после размещения их на бирже 24.12.2013 не производилось ни одним из участников торгов, включая Россию.
3. Следовательно, возможно, эти никем неоплаченные украинские облигации на \$3 млрд. из Ирландской биржи или уворованы организаторами (участниками) размещения, к которому имеет прямое отношение структурные подразделения Вашего банка. Соблюдение законности проведения процедуры размещения украинских евробондов на \$3 млрд. на Ирландской фондовой бирже взяло на себя подразделение ВТБ банка ("VTB Capital plc") и из бюджета Украины вне конкурса, то есть уголовным способом "VTB Capital plc" завладело \$ 450 000.

В соответствии со ст. 13 Конвенции ООН против коррупции 2003 просим информировать о следующем:

1. Возвращены ли на сегодняшний день в бюджет Украины \$ 450 000 , полученные подразделением Вашего банка за сфальсифицированный листинг на Ирландской бирже.
2. Какие меры приняты центральным офисом Вашего банка по розыску пропавших неоплаченных облигаций на сумму \$3 млрд. с Ирландской биржи, к законности процедуры размещения которых имеет непосредственное отношение Ваш банк и создана угроза имиджу Вашего банка.
3. Подтвердите свою готовность выполнять Конвенцию ООН против коррупции 2003, к устраниению последствий коррупции и корректировки деятельности с учетом необходимости использовать механизмы досудебного разрешения вопроса.

И информируем, что наше расследование носит независимый характер и не совпадает с коррупционной позицией Украины в этом вопросе.

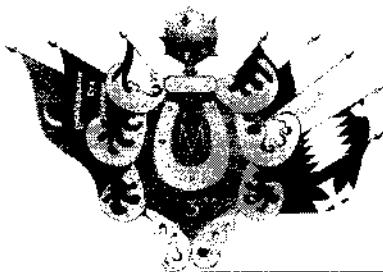
Ответ пожалуйста направьте в ближайшее время.

За собой оставляем право использовать данное обращение в судебных исках.

С уважением,

Исполнительный директор
Международного антикоррупционного суда





International Anti-Corruption Court (IACC, ID 40019132)

03087, Ukraine, Kiev, Post box 27, tel.: +38 067 398-80-57,

Адреса: 03087, м. Київ, а/с 27, е-мейл: blacklisteu@mail.ru

№ 0160202148 від 25.01.16

Прем'єр-міністру України А.П. Яценюку (особисто)

Міністру внутрішніх справ України А.Б. Авакову (особисто)

Запит

**щодо ролі Національної поліції Іспанії в ізоляції свідків на користь аферистів по
відмиванню коштів із Фонду національного добробуту Росії**

Для захисту фундаментальних прав українців та громадян США (за рахунок яких покривають збитки) проти міжнародної корупційної афери ворогів України, які разом із зрадниками що залишились на ключових постах в ряді державних відомств уже 2 роки, мабуть в прислужництво Путіну та Януковичу, покривають їх антиукраїнські злочини та замість присвоєння статусу одіозний борг, фальсифікують документи та визнають як державний борг \$3 млрд. подаровані Росією українській владі із Фонду національного добробуту Російської Федерації у грудні 2013 року згідно зі ст. 13 Конвенції ООН проти корупції та Закону України «Про доступ до публічної інформації», Закону України «Про інформацію» прошу інформувати про наступне:

1. Які претензії або вимоги чи інші офіційні звернення отримували центральні органи влади України від Національної поліції Іспанії щодо корупції або саботажу з боку України в справі затягування екстрадиції бувшого міністра фінансів України Юрія Колобова, який уже рік як заарештований поліцією в Іспанії та не може виступити головним свідком у визнанні подарованих Росією українській владі \$3 млрд. із Фонду національного добробуту Російської Федерації у грудні 2013 року як одіозний борг.

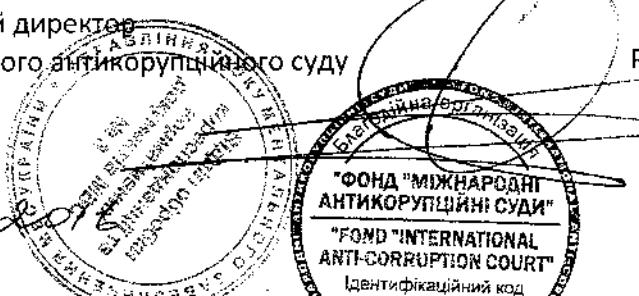
2. Які заходи з Вашого боку було вжито щодо усунення перешкод для екстрадиції з Іспанії бувшого міністра фінансів України Юрія Колобова та захисту України аферистів по відмиванню коштів із Фонду національного добробуту Росії.

Залишаємо за собою право використати цей запит та надану Вашу відповідь в судових процесах.

З повагою,

Виконавчий директор
Міжнародного антикорупційного суду

Руслана Броніна



ФОНД "МІЖНАРОДНІ
АНТИКОРУПЦІЙНІ СУДИ"

"FOND "INTERNATIONAL
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Ідентифікаційний код



Doc M4

US Senator Orrin Hatch

Contact Form

Thank you for contacting me via my website, Ruslana Bronina. I created this webform because I was concerned that important comments, questions, and requests would get lost in the immense flood of e-mail correspondence. The new system categorizes and organizes my incoming mail more efficiently, enabling me to respond more quickly and without the risk of losing messages in the shuffle. If this new format does not suit your needs, you are more than welcome to call, fax, or mail a letter to my office in the future. If you provided me with the contact information requested on the webform, I will reply to your message by mail. As you might expect, the convenience of e-mail has significantly increased the volume of correspondence I receive, and I regret that I am unable to respond personally if you are not a Utah resident. Again, thank you for sharing your views. Sincerely,



Please Print this page for your records:

First Name: Ruslana **Last Name:** Bronina

Email Address: blacklisteu@mail.ru

Phone: +380673988057

Address 1: International anti-corruption court

Address 2: 31, build.2, str. Umanskaya **City:** Ukraine, Kiev

State: AP

Zipcode: 03087

Topic: Finance

Your message:

№ 01599111435 from 28.11.15 To the Chairman of Senate Committee on Finance To the Honorable Senator Orrin G. Hatch Complaint - protest against financial fraud of V. Putin at the expense of US taxpayers
International anti-corruption court declares about incompetent assessment of financial fraud, implemented by the President of the Russian Federation Vladimir Putin and ex Ukrainian Prime Minister Nikolai Azarov, that in 2013 by a criminal way, violating more than 10 laws of national and international law, have conducted an operation to withdraw from Russia and laundering in Ukraine \$ 3 billion of money of Russian people with further their plundering. Ukrainian authorities, relying on the recent IMF estimate about that the debt of \$ 3 billion is a state (sovereign) debt of Ukraine, (but not corruption debt), does not expose scammers, and extort from the American people to compensate these \$ 3 billion of corruption and stupidity. Our investigations and the evidence base that the above transaction between Azarov and Putin by laundering \$ 3 billion in Ukraine - it is financial scam, we were sent to the District Administrative Court of Kiev with a complete set of evidence, namely: 1. Any agreements on borrowing by Ukraine from Russia no \$ 3 billion , no \$ 15 billion does not exist. 2. Money in the amount of \$ 3 billion has been taken from the National fund of welfare of the Russian Federation, contrary to law "Resolution of the Government of the Russian Federation from January 19, 2008 № 18 "On the Management of the National Welfare Fund ". 3. Mr. Azarov, in his turn, issued a resolution of Cabinet of Ministers of Ukraine from December 18, 2013 №904 "On state external borrowing in 2013", also contrary to the will of the Ukrainian people, Law of Ukraine "On State Budget of Ukraine for 2013", Budget

codex of Ukraine, unauthorized way single-handedly used his official position, allowing on behalf of Ukraine exceed the limit of external borrowings by \$ 3 billion, without substantiating his actions in the above resolution. 4. Permission from the Verkhovna Rada of Ukraine to increase state debt at the time of publication of Resolution there was no. 5. According to a number of articles of the Ukrainian legislation, namely: -Art. 228 of the Civil Code of Ukraine; - part 1 of Art. 207, Art. 208 of the Economic Code of Ukraine; - Art. 34 of the UN Convention against Corruption, \$ 3 billion under the laws of direct action are recognized corrupt and anti-popular and are subject to cancellation. Thus, unfortunately, the IMF experts have been misled by Ukrainian corruptionists concerning the 3 billion Ukraine's debt before Russia. Still more, anti-corruption department of the IMF criminally had ignored directed by us earlier statements about the facts of corruption upon bond placement by Ukraine at the amount of \$ 3 billion. As a result of this package of corruption violations and low professionalism of IMF experts, instead of exposing the corrupt scam of V.Putin and Yanukovich had happened compulsion to pay a debt of \$ 3 billion to V.Putin, at the expense of US taxpayers' money, because this money is already been plundered, but other sources to cover up the fraud are no. We ask the President of the United States, the US Government, the United States Congress and international financial institutions to protect the interests of US taxpayers, to prevent servile humiliation of the American people to pay for the debts of thieves and swindlers, which together have gathered in Russia and with curiosity watching process of capitulation Ukraine and the United States in created by them the scam. US prosecutors office ask to institute criminal proceedings on the fact of falsification of documents by the Ministry of Finance of Ukraine, which, apparently, on the orders of Vladimir Putin (who at all levels said that the IMF must help Ukraine to pay off with Russia), officially declares, that agreement on \$3 billion there is, and necessary repay this debt, but the Ministry of Foreign Affairs of Ukraine and the National Bank of Ukraine argue that such agreement is not and was not. We ask take measures to the Government of Ukraine, to prevent the implementation of the plan of Putin and Yanukovich to force the American people to pay for the stolen and laundered by them \$ 3 billion, send a note of protest to the Government of Ukraine to annul the criminal Resolution of Cabinet of Ministers of Ukraine from December 18, 2013 №904 "On state external borrowing in 2013" and according to the Law of Ukraine "About International Private Law" to conduct a judicial procedure annulment the corrupt debt of Ukraine before Russia.



International Anti-Corruption Court (IACC ID 40019132)

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Адреса: 03087, м.Київ-87, а/с 27, е-мейл: blacklisteu@mail.ru

№ 01512448028 від 23.12.15

**Голові Національного Банку України
Валерії Гонтаревій (особисто)**

Антикорупційний запит

В межах протистояння фінансовій агресії Російської Федерації та проведення компанії міжнародних антикорупційних заходів проти змови корупціонерів Уряду Росії та Уряду М.Я. Азарова задля виведення з Росії та подальшого розкрадання 3 млрд. доларів США у відповідності зі статтею 13 Конвенції ООН проти корупції, ратифікованою Законом України від 18.10.2006 № 251-У «Про ратифікацію Конвенції Організації Об'єднаних Націй проти корупції», Законом України «Про доступ до публічної інформації», Законом України «Про інформацію» прошу інформувати в 5 денний термін про наступне:

1. Підтвердити інформацію про те, що кошти з Фонду національного благосостояння Російської Федерації або з іншого джерела фінансування Російської Федерації у розмірі 3 мільярдів доларів США були перераховані з Російської Федерації 23 грудня 2013 року до Національного банку України.
2. Вкажіть номер платіжного документу або інші документальні докази такого перерахування.
3. Чи вказувалася в платіжних документах мета такого перерахування, якщо вказувалася, то будь-ласка наведіть у своїй відповіді дослівно, можна мовою оригіналу.

Ваша відповідь на виконання вищезазначеного запиту буде слугувати документальним доказом вашої позиції в справі захисту України від іноземної фінансової агресії.

З повагою,
Виконавчий директор
Міжнародного антикорупційного суду



Руслана Броніна



International Anti-Corruption Court (IACC, ID 40019132)

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e-mail: blacklisteu@mail.ru, eriip.com – member of CAO IACC

№ 01511120345 от 11.12.15

Президенту Российской Федерации
В.В.Путину

Предсудебный запрос

Международный антикоррупционный суд проводит судебную компанию по аннулированию финансовых обязательств Украины (в том числе, 3-х миллиардов долларов США перед Российской Федерацией), которые согласно наших эксклюзивных исков в судах США и ЕС и независимой доказательной базы для судебных процессов о незаконности таких заемов станут основанием для признания таких финансовых обязательств как коррупционных, а следовательно, подлежащих аннулированию согласно Конвенции ООН против коррупции.

Поскольку ряд Правительственных ведомств Украины признали факт отсутствия в Украине каких-либо официальных соглашений о заимствовании у Российской Федерации 3-х миллиардов долларов США (или 15 миллиардов долларов США), просим опровергнуть такое утверждение об отсутствии соглашений (договоров), а если такие соглашения имеют место, то подтвердить это заверенной копией соглашений, направленной в наш адрес.

Оставляем за собой право использовать этот запрос и предоставленный Вам ответ в судебных процессах.

С уважением,

Исполнительный директор
Международного антикоррупционного суда

Руслана Бронину

